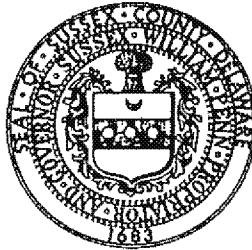


Sussex County
Engineering Department

Robert W. Wood, P.E.
Sussex County Engineer



COURTHOUSE ANNEX
P.O. BOX 589
GEORGETOWN, DELAWARE 19947

PHONES

Engineering Dept.	302-855-7718
Planning & Permits Div.	302-855-7719
Public Works Div.	302-855-7703
Utility Construction Div.	302-855-7717
Operations & Maintenance Div.	302-855-7730

Fax: 302-855-7799

August 8, 1994

Mr. Danny Williamson
Route 5 Box 1C
Blades DE 19973

REF: BLADES SANITARY SEWER DISTRICT
OPERATIONS AND MAINTENANCE
DISCHARGE PERMIT NO. BL-94001

Dear Mr. Williamson:

Enclosed please find the renewed industrial discharge permit for Peninsula Plating, Inc., located on River Road in the Blades Sanitary Sewer District. This permit supersedes Industrial Wastewater Contribution Permit No. BL-92001, which was issued to Old Brass Works/Danny Williamson on August 10, 1992. This permit has been developed in accordance with the Code of Sussex County, the United States Environmental Protection Agency's "Effluent Guidelines for the Electroplating Industry," as published in 40 CFR, Parts 136, 403, and 433, and the agreement between the City of Seaford and the Sussex County Council, dated June 29, 1977.

Please note that the agreement outlines the method for sewer usage charges. Two charges are involved. Both are based on explanations and definitions contained in the Code of Sussex County. The quarterly service charge will be billed on an approximate usage of 500 gallons per day (gpd) (an estimate provided by you.) The Code defines an equivalent dwelling unit (EDU) as producing 300 gpd of wastewater. Using your estimate, your assessment will be 1.67 EDUs. The front foot assessment charge, to be billed annually, is essentially based on the assessable front footage of the property with an adjustment for multiple EDUs.

If you should have any questions, please feel free to contact me.

Sincerely,

SUSSEX COUNTY ENGINEERING DEPARTMENT

RW Wood

for Russell W. Archut
Director of Planning and Permits

xc: The Honorable Dale R. Dukes w/o enclosure
Mr. Robert L. Stickels w/o enclosure
Mr. Robert W. Wood, P.E. w/o enclosure
Mr. Anthony DiGiuseppe with enclosure
Ms. Heather Sheridan w/o enclosure
Mr. Paul Janiga with enclosure
Mrs. Delores Slatcher with enclosure

SUSSEX COUNTY COUNCIL
POST OFFICE BOX 589
GEORGETOWN, DELAWARE 19947

INDUSTRIAL WASTEWATER CONTRIBUTION PERMIT

In accordance with the provisions of the "Code of Sussex County,"
Chapter 110, Part 1, Sewer Use,

Peninsula Plating, Inc.

Rt. 5 Box 1C, River Road

Blades DE 19973

is granted permission to discharge wastewater to the Blades
Sanitary Sewer District at the location designated as:

Peninsula Plating, Inc.

Rt. 5 Box 1C

Blades, DE 19973

Tax Map 1-32-1.15 (16)

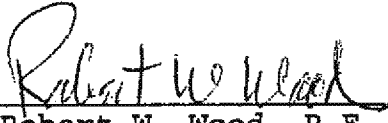
subject to the permit conditions established.

Effective Date: August 10, 1994

Expiration Date: June 29, 1997

*Changes may be necessary before the expiration date due to
changes in Federal, State, or County regulations or the
agreement between the County Council and the City of
Seaford.

Signed:


Robert W. Wood, P.E.
Sussex County Engineer
Sussex County, Delaware

NOTE: This permit supersedes Industrial Wastewater Contribution
Permit No. BL-92001, issued to Old Brass Works/Danny Williamson on
August 10, 1992.

PERMIT CONDITIONSGeneral

1. The named permit holder shall be expressly subject to all provisions of the "Code of Sussex County, Chapter 110, Part 1" and all other regulations established by the Sussex County Council.
2. The permit holder will be responsible for all user charges and fees, as outlined in the "Code of Sussex County," Chapter 110, and any other fees or charges as established by the Sussex County Council.
3. This wastewater discharge permit is issued in the name of the permit holder and shall not be reassigned or transferred or sold to a new owner, new user, different premises, or a new or changed operation without the prior approval of the Sussex County Council.
4. The permit holder shall report to the Sussex County Engineer any changes (permanent or temporary) to the premises or operations that significantly change the quantity or quality of the wastewater discharge, described in the wastewater discharge permit application submitted by the permit holder, or deviate from the terms and conditions under which this permit is granted. The Sussex County Engineer shall be informed by telephone within 24 hours of the change and shall be confirmed in writing within 10 days of the change.

Note: This requirement includes notification of the Sussex County Engineering Department (SCED) when new plating operations are implemented.

5. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Water Act and Title 7, Section 6033, Delaware Code Annotated and is grounds for enforcement action; for permit termination and revocation and reissuance or modification; or denial of a permit renewal application.
6. The permittee must comply with the monitoring and reporting requirements of the general pretreatment regulations, 40 CFR, Part 403.
7. The permit holder may submit semi-annual certification statements of no dumping of solvents in lieu of Total Toxic Organics (TTO) monitoring. Each semi-annual report must be signed by a responsible corporate officer of the company or manager responsible for the overall plant operation and submitted in accordance with 40 CFR 403.12(e).

FEB 10 1995

8. Within 45 days of initiating plating operation, the permittee shall submit a solvent management plan to the County for approval. The solvent management plan shall specify to the Sussex County Engineer's satisfaction the toxic organic compounds used; the method of disposal used instead of dumping, such as reclamation, contract hauling or incineration; and procedures for assuring that toxic organics do not spill or leak into the wastewater.
9. The permittee shall notify the Sussex County Engineer when plating operations and wastewater discharge begin.

Effluent Limitations

Effluent limitations shall be in accordance with the requirements of the "Code of Sussex County," or the U. S. Environmental Protection Agency (EPA) Effluent Guidelines for the Electroplating Industry, as published in 40 CFR, Part 433.

<u>Pollutant or</u> <u>Pollutant Property</u>	Max. For Any <u>Day</u> (mg/l)	Monthly Average <u>Shall Not Exceed</u> (mg/l)
Cadmium (T)	0.11	0.07
Chromium (T)	2.77	1.71
Copper (T)	3.38	2.07
Lead (T)	0.69	0.43
Nickel (T)	3.98	2.38
Cyanide (T)	1.20	0.65
Zinc (T)	2.61	1.48
Silver (T)	.43	.24
TTO	2.13	---

Source: 40 CFR, Section 433.17

<u>Pollutant or</u> <u>Pollutant Property</u>	Max. For Any <u>Day</u> (mg/l)	Monthly Average <u>Shall Not Exceed</u> (mg/l)
Biochemical Oxygen Demand (BOD)	300	200
Total Suspended Solids (TSS)	300	240
Maximum Temperature	100°F	
pH	must be maintained between 5.5 and 9.5 units	

Source: "Code of Sussex County" and City of
Seaford Agreement.

General Prohibition

The permittee shall never increase the use of process water or in any way attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in the "Federal Categorical Pretreatment Standards" or in any other pollutant-specific limitation developed by the County or State.

Monitoring Requirements

The permitted discharge shall be monitored by the permit holder in compliance with the following schedule:

<u>Effluent Constituent</u>	<u>Monitoring Requirement</u>	
	<u>Measurement Frequency</u>	<u>Sample Type</u>
Temperature & Cyanide	One per month	Grab
Cadmium ¹ , Chromium ^{1, 7} , Copper ¹ , Lead ¹ , Nickel ^{1, 2} , Silver ^{1, 3} , & Zinc ^{1, 6}	One per month	(See Note 5)
BOD, TSS & pH	One per month	Grab by SCED
BOD & TSS	One per year	8-hour composite
TTO	One semiannually	Grab

(This does not preclude the SCED taking unannounced samples in addition to those taken by the permittee.)

The permittee may petition the County for a reduction in monitoring frequency after six months of operation.

Notes:

- (1) Sampling shall be taken on a day when these substances are likely to be present in their maximum concentration, including spent chromating tank and other periodic discharges to the sanitary sewer.
- (2) Sampling for nickel shall be done on a day when nickel plating wastewaters are discharged to the sanitary sewer and nickel is expected to be present in its maximum concentration.

- (3) Sampling for silver shall be done on a day when silver plating wastewaters are discharged to the sanitary sewer and silver is expected to be present at its maximum concentration.
- (4) Monitoring for cyanide must be conducted before dilution with other waste streams, and when cyanide is expected to be present at its maximum concentration.
- (5) Flow proportional composite sample over daily duration of discharge. The SCED may waive this requirement if permittee demonstrates that flow-proportional sampling is infeasible. If the flow-proportional composite requirement is waived an 8-hour composite sample must be substituted.
- (6) Sampling for zinc shall be done on a day when zinc plating wastewaters are discharged to the sanitary sewer and zinc is expected to be present at its maximum concentration.
- (7) Sampling for chrome shall be done on a day when chrome plating wastewaters are discharged to the sanitary sewer and chrome is expected to be present at its maximum concentration.

Other Monitoring Requirements

- (1) Implementation of an approved toxic organic management plan and submission of semiannual certification statement as specified by 40 CFR 433.12 may be used in lieu of monitoring for TTO. The County reserves the right to require the permittee to monitor for TTO to determine compliance with the TTO standard at any time.
- (2) All analyses be performed in accordance with EPA approved analyses methods (40 CFR, Part 136) by an independent testing firm.

Periodic Discharge Reports

A discharge report containing the results of the monitoring program shall be filed with the County Engineer by the second Tuesday of each month. Additional information to be included in each report is as follows:

Monthly average water consumption

Rate and Time of Discharge

The average production day flow permitted for discharge at the designated location shall not exceed 1,000 gpd on a thirty (30) day average.

The maximum N/A discharge flow rate shall not exceed _____ for a period of _____ hours.

Installation of Inspection, Sampling, and Meter Facilities

The permit holder is required to install an inspection and sampling manhole at the following location(s):

Sampling point in waste line, immediately outside the structure, housing the production area that includes the total wastewater flow from the production facilities. Sanitary facilities (not production related, i.e. toilets, washstands, etc.) must be connected to the waste line down stream of the sampling point.

A meter to measure the wastewater discharge shall be installed at the following location(s):

Flow meter not required - water use records to be provided by permittee.

Sewer User Charges

In accordance with the "Code of Sussex County," Chapter 110, the permit holder shall be charged for sewer use, as follows:

1. Service charge to be billed quarterly. It will be based on the number of fixture units or the wastewater flow, whichever results in the greater assessment. Six (6) fixture units = one (1) EDU = 300 gallons per day.
2. Front Foot Assessment Charge to be billed annually. It will be based on Section 110-92, "Code of Sussex County."
3. Surcharges for BOD and TSS shall be based upon:
 - (a) BOD: N/A lbs./1,000 gallons
TSS: N/A lbs./1,000 gallons
 - or
 - (b) Laboratory sampling analyses of flow during the previous quarter according to:

NA

Copies to: R.W.W.

Tony
Discharge Permit # BL-92001

R.O.

received
4/11/95

LAW OFFICES

WILSON, HALBROOK & BAYARD
PROFESSIONAL ASSOCIATION

107 WEST MARKET STREET

P. O. BOX 690

GEORGETOWN, DELAWARE 19947

TELEPHONE (302) 856-0016

TELECOPIER (302) 856-7116

EUGENE H. BAYARD
CLAYTON E. BUNTING
DENNIS L. SCHRADER
ROBERT G. GIBBS
ERIC C. HOWARD
MARK D. OLSON

VERONICA O. FAUST

HOUSTON WILSON
(1910-1980)

ROBERT L. HALBROOK
OF COUNSEL

April 10, 1995

John Donaway
Peninsula Plating, Inc.
Route 5, Box 1C
River Road
Blades, DE 19973

RE: Blades Sanitary Sewer District

Dear Mr. Donaway:

Please be advised that I am Assistant County Attorney for Sussex County, Delaware, and it has been brought to my attention by the County Engineer's Office that you have failed to comply with portions of the Industrial Wastewater Contribution permit granted to Peninsula Plating, Inc. effective August 10, 1994.

As of this date, those deficiencies are as follows:

You have failed to provide discharge reports on or before the second Tuesday of each month including monthly average water consumption figures for the months of November and December 1994 and for January, February and March 1995.

Further, you have failed to provide Sussex County with a waste management disposal plan for the removal of toxic or deleterious compounds from the premises as is required by the permit.

If you have not complied with these requirements to the satisfaction of the County Engineer's Office within fifteen (15) days of the date of the receipt of this letter, I will have no alternative but to seek the termination of the permit.

Please govern yourself accordingly.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'Dennis L. Schrader', with a stylized flourish at the end.

Dennis L. Schrader
Assistant County Attorney
Sussex County, Delaware

DLS/lkpr

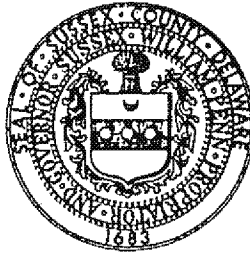
cc: Sussex County Engineering Department

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

No. P646670451

Sussex County
Engineering Department

Robert W. Wood, P.E.
Sussex County Engineer



COURTHOUSE ANNEX
P.O. BOX 589
GEORGETOWN, DELAWARE 19947

PHONES

Engineering Dept.	302-855-7718
Planning & Permits Div.	302-855-7719
Public Works Div.	302-855-7703
Utility Construction Div.	302-855-7717
Operations & Maintenance Div.	302-855-7730

Fax: 302-855-7799

May 8, 1995

Dennis L. Schrader, Esquire
Wilson, Halbrook & Bayard, P.A.
107 West Market Street
Post Office Box 690
Georgetown DE 19947

REF: BLADES SANITARY SEWER DISTRICT
OPERATIONS AND MAINTENANCE
DISCHARGE PERMIT NO. BL-94001
PENINSULA PLATING

Dear Mr. Schrader:

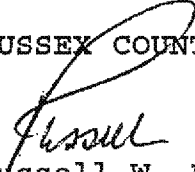
In the above referenced matter, you advised Peninsula Plating, Inc. in a certified letter dated April 10, 1995, that they had fifteen (15) days to comply with certain requirements on their Industrial Wastewater Contribution Discharge Permit.

As of 4:30 p.m. today, our records show that Mr. John Donaway, President of Peninsula Plating, Inc. has not responded to your recent letter.

Please advise me how you wish to proceed with these two outstanding permit violations. Your immediate attention to this matter is sincerely appreciated. If you need additional information or have any questions, please feel free to contact me.

Sincerely,

SUSSEX COUNTY ENGINEERING DEPARTMENT


Russell W. Archut
Director of Planning and Permits

RWA/jed

xc: Mr. Anthony DiGiuseppe

Sussex County

LOCAL EMERGENCY
PLANNING COMMITTEE



EMERGENCY OPERATIONS CENTER
100 AIRPORT ROAD
P.O. BOX 588
GEORGETOWN, DE 19947

TO: <i>BOB BARRISH</i>	FROM: <i>LYNN Bullock</i>	DATE: <i>5/10/95</i>
FAX #: <i>323-4561</i>	FAX #: <i>855-7872</i> PHONE #: <i>855-7801</i>	PAGES INCLUDING THIS PAGE: <i>2</i>
TO: <i>BOB Pritchett</i>	FROM:	DATE: <i>1/1</i>
FAX #: <i>736-5060</i>	FAX #: PHONE #:	PAGES INCLUDING THIS PAGE:

May 10, 1995

Peninsula Plating, Inc.
John W. Donoway, President
Rt. 5 Box 1C
Blades, Delaware 19973

Dear Mr. Donoway,

As per a prearranged meeting, Mr. Robert Barrish, Mr. Robert Pritchett, of the Department of Natural Resources and I visited your facility this date to discuss possible compliance violations. We were very dismayed to learn that you were not available to talk with us concerning this problem. Mr. Barrish and Mr. Pritchett traveled over 100 miles for this meeting.

We asked for and received permission from one of your employees, to walk through your facility. During this cursory walk through, and observing the chemicals on site, we can say that you are definitely not in compliance in the areas of reporting the chemicals to the Department of Natural Resources in their program, and completion of a Community Emergency Response Plan for the Local Emergency Planning Committee.

With this in mind I would strongly suggest that you contact either of us, within the next 7 days to set up another appointment, so that we might discuss these very important issues. Compliance has always been your responsibility. Failure to comply, can result in substantial monetary penalties.

There are other issues that must be discussed as well. Some, but not all have been listed below:

- No Material Safety Data Sheets (MSDS) for the chemicals on site could be located by your employee.
- Your employee had not seen (my understanding) any of the MSDS's for the chemicals he was working with daily.
- Storage of chemicals
- Corrosive immediately adjacent to a propane cylinder
- Different chemicals stored on top of each other
- Capability of the chemicals stored is questionable
- Overall unsafe conditions
- Open container, drip pan, with oil in it, located on the floor
- Welding operations taking place in the same room where chemicals are stored
- Tires, beer cans, and other obstacles on, near, and surrounding the area where the chemicals are stored.
- Hoses from welders/torches on the floor and in the normal walkways

Other questions I have, are:

- How long have you been in operation?
- Why have you not reported or attempted compliance?
- where do you store your hazardous waste?
- What method or procedure do you have in place to dispose of it? Where does it go? There should be some type of paper trail to cover this area.

Your facility, as seen at this time, creates an imminent hazard to the health and safety of your employees and the surrounding community in general. It is a situation which must be corrected.

I await the opportunity to discuss these comments with you.

Yours Truly,



Lynn R. Bullock, Chair
Sussex County Local Emergency Planning Committee

PH
TSS
BOD

HAZARDOUS WASTE COMPLIANCE ASSESSMENT REPORT

CONFIDENTIAL

TO: Karen G. J'Anthony KGT
FROM: Alan H. Simpson AHS
SUBJECT: CA at Peninsula Plating
REFERENCE: Non-Notifier, FILE CODE: 21
DATE: May 12, 1995

GENERATOR SITE

ADDRESS: River Road
Blades, Delaware 19973

GENERATOR MAILING

ADDRESS: Same as above

SITE REPRESENTATIVES: John Donaway, President
Dan Mitchell, Vice President

HWMB REPRESENTATIVES: Alan H. Simpson and Robert R. Palmer

DATE OF ASSESSMENT: April 13, 1995

PURPOSE OF ASSESSMENT: CA

CURRENT FACILITY STATUS: Peninsula Plating has not notified. Based on what I observed, Peninsula generates conditionally exempt small quantity generator waste.

PRE-ASSESSMENT SAFETY PREPARATION

Based on what I know about the plating industry, I determined that steel toed boots, a hard hat, safety glasses with side shields and a photoionization detector were adequate safety equipment.

FACILITY DESCRIPTION

Custom Captive is located just off Market Street in Blades, Delaware. Peninsula electroplates copper, nickel, brass and chromium onto metal objects. These operations are common to the industry. Business is from off the street customers. Peninsula has no contracts with large companies.

The Old Brass Works preceded Peninsula as the plating business at this address. Ownership changed in the last few years and the name was changed to Peninsula Plating. The telephone book lists an Old Brass Works in Seaford.

PROCESS DESCRIPTION

Peninsula Plating presently has electrolytic plating baths set up for four different metals - chrome, copper, nickel and brass. All parts to be plated go first into a 20% sodium hydroxide cleaning tank. Parts are then water washed in rinse tanks and then put into the activator bath. (The activator bath contains Acksalt #6 Activator manufactured by McGean - Rohco, Inc.). Parts which are to be copper or copper/nickel plated, are first electroplated in a copper cyanide strike bath and then water rinsed.

The parts are then electrolytically plated with one or more of the four different metals. After each plating step, the parts are water rinsed and then placed in the activator. Nickel plating is usually preceded by copper plating. Chrome plating is usually preceded by nickel plating. My information on the plating systems came from material safety data sheets supplied by Peninsula Plating. Information on chemical components of the plating system came from the 1993 Metal Finishing Guidebook and Directory Issue.

<u>Plating System</u>	<u>Hazardous Chemical Component</u>
copper sulfate	possible low pH from sulfuric acid (p. 202)
nickel sulfate	a minority of systems have a low pH from sulfuric acid (p. 233)
brass cyanide	cyanide salts
copper strike	cyanide salts
chromic acid (chrome)	hexavalent chromium lead chromate sludge from anodes

Sulfuric acid and hydrochloric acid strippers are also used at the Peninsula for cleaning the parts. A diagram of the plating room is part of this memo.

CHEMICAL INVENTORY

The following is an inventory of the chemicals we found inside the chemical storage area. Determining the contents of the drums sometimes required asking Peninsula Plating personnel because of mislabeling or no labeling. Based on my knowledge of the present Peninsula operations, I did the classifying of chemicals into the three use categories.

1. Unused materials which can be used by Peninsula.

- 2 1/2 drums of nickel sulfate in white manufacturers drum
- 1/2 drum of sulfuric acid
- 1/3 drum of chromic acid
- partial drum of nickel chloride
- 15 gallons of hydrogen peroxide
- 10 gallons of sodium hydroxide solid form
- One drum of copper cyanide
- One drum of Acksalt #6

2. Used material which can possibly be used.

- Seven drums of nickel sulfate plating solution

3. Chemicals of no use to present operations.

One drum of ARDROXRC 6535
One drum of zinc cyanide solution
One drum of flat nickel solution
One drum of alkaline metal cleaner for electroless plating
25 gallons of cadmium fluoborate

WASTE STREAMS

The cyanide and nickel baths recirculate through filters. The spent filters have been placed in a single drum which is dedicated to the accumulation of hazardous waste. The only other hazardous waste routinely generated and removed from the process tank is sludge from the rinse tank. This sludge is also accumulated in this partially filled container of hazardous wastes. If all the hazardous waste that Peninsula Plating has generated is within this drum, then Peninsula Plating is a conditionally exempt small quantity generator. Overflow from the water rinse tanks is discharged to Sussex County's POTW under pretreatment permit BL 94001.

The potential for baths to become spent is discussed in the 1993 Metal Finishing Guidebook and Directory Issue. The Guidebook says the following about the types of plating baths at Peninsula:

- Carbonates are formed and build-up in cyanide baths (p. 199)
- Regarding chromium plating "The slow, but persistent build-up of cationic impurities such as iron, copper, zinc and aluminum in a chromium bath has historically been the life limiting step for a solution" (p. 194 functional chromium).
- Regarding nickel plating, "Because anode efficiency exceeds cathode efficiency by a small percentage, nickel ion concentration and pH will rise as the bath is used" (p. 230).

According to John Donaway and Dan Mitchell, no plating bath or prebath cleaning chemicals have been removed from their process tanks. Any material that remains in the process tank, is not considered a hazardous waste (§261.4(c)). However, seven drums of nickel sulfate solution were found in the Chemical Storage Area. In house labeling of the drums and historic paperwork from the supplier recommending that Peninsula "cut" their nickel bath, indicates that these seven drums of nickel sulfate solution could have been removed from the process tank as spent bath.

On April 27, 1995, I talked to Wayne Anderson, President of Harper Thiel Plating, about the likelihood of operating hexavalent chrome and cyanide baths without generating wastes. Here is what he told me.

- Decorative chromic acid bath - lead chromate sludge is generated from lead/tin anodes. Sludge build-up results in less usable volume in the plating tank. Misting from the tank contaminates nearby equipment and debris. However, the plating is decorative and agents have been added to decorative chromium plating to prevent misting.
- Copper cyanide strike - carbonate build-up causes quality to deteriorate. Also, the iron electrodes in strike solutions cause ferrocyanide build-ups. However, it is not implausible that they could still be operating without removing anything from the plating bath. We found no drums of chemicals related to hexavalent chromium or brass and copper cyanide baths. However, a measurable sludge level has already built-up in the sulfuric acid stripper drum.

APRIL 13, 1995 WALK THROUGH

Robert R. Palmer and myself were accompanied by John Donaway and Dan Mitchell on a walk through of all areas of then building and all outside areas. Specifically, we walked through the following areas:

Building

chemical storage room
workshop room
storage room for miscellaneous
prep room (also final buffing is done here)
plating area

Outside

Outback (scrap parts and twenty or more dumpsters belonging to Seaford Disposal Service)

TOXIC CHEMICAL RELEASE INVENTORY

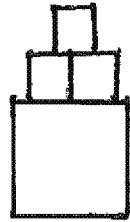
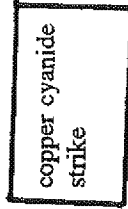
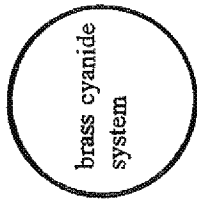
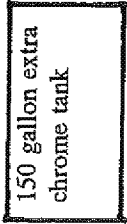
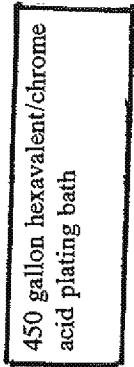
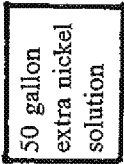
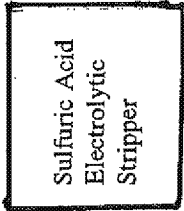
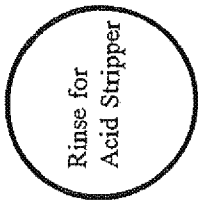
The Air Resources file has no toxic chemical release report from Peninsula Plating.

LAND BAN

There have been no manifested shipments of hazardous waste offsite. Thus, no land ban notifications are required.

PENINSULA
AHS:trh

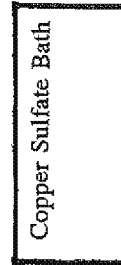
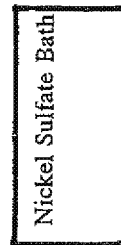
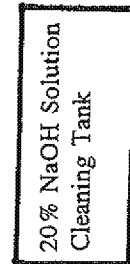
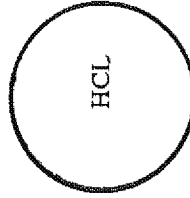
cc: Robert Pritchett, Air Resources
Robert Barrish, Air Resources
Ken Cross, Water Resources
John Mohrman, Emergency Response
Anthony DiGiuseppe, Sussex County Engineering
Lynn Bullock, Sussex County LEPC



Series of water rinses



Flow Downhill



To the office
↓

70841

30
12.45

S/ Print
for Mike Moore

Peninsula Platting

5-24-95

Community right
Mike W Cook
Environment Protection
Service

Bob program by time limit
June 24, 1995
Fire chief
Public safety

CHEMICAL INVENTORY

The following is an inventory of the chemicals we found inside the chemical storage area. Determining the contents of the drums sometimes required asking Peninsula Plating personnel because of mislabeling or no labeling. Based on my knowledge of the present Peninsula operations, I did the classifying of chemicals into the three use categories.

1. Unused materials which can be used by Peninsula.

- 2 1/2 drums of nickel sulfate in white manufacturers drum
- 1/2 drum of sulfuric acid
- 1/3 drum of chromic acid
- partial drum of nickel chloride
- 15 gallons of hydrogen peroxide
- 10 gallons of sodium hydroxide solid form
- One drum of copper cyanide
- One drum of Acksalt #6

2. Used material which can possibly be used.

- Seven drums of nickel sulfate plating solution

3. Chemicals of no use to present operations.

- One drum of ARDROXRC 6535
- One drum of zinc cyanide solution
- One drum of flat nickel solution
- One drum of alkaline metal cleaner for electroless plating
- 25 gallons of cadmium fluoborate

To: Peninsula Plating File
(62 44 001)



STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES
& ENVIRONMENTAL CONTROL
DIVISION OF AIR & WASTE MANAGEMENT
89 KINGS HIGHWAY
P.O. Box 1401
DOVER, DELAWARE 19903

AIR QUALITY MANAGEMENT
SECTION

TELEPHONE: (302) 739-4791
FAX No.: (302) 739-3106

May 25, 1995

John Donaway
Peninsula Plating
Route 5 Box 1C
Blades, DE 19973

Dear Mr. Donaway,

The purpose of this letter is to confirm our May 24, 1995 discussions concerning the status of your facility with Delaware's Emergency Planning and Community Right-to-Know Act (EPCRA) requirements. The discussions, which took place during our visit to your facility, were as follows:

1. Within 30 days from the date of our discussions, you will compile and submit the necessary hazardous chemical inventory reports and associated reporting fees for your facility. Upon your request, we will provide assistance in completing the reports.
2. We strongly urge you to:
 - A. Continue your efforts to improve chemical storage practices at your facility.
 - B. Review the status of your worker right-to-know activities. To assist you in this area, information is attached concerning free OSHA consultation services.
 - C. Contact your local Fire Department and provide them an opportunity to tour your facility.

In addition to the above, we also recommend you contact Lynn Bullock, your Local Emergency Planning Committee (LEPC) representative, at (302) 855-7801. Based upon the substances stored at your facility, the Sussex County LEPC will require additional information concerning your facility as part of their efforts to establish and maintain community emergency plans.

If you have any questions or need additional information, please feel free to contact me.

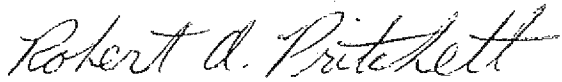
Delaware's good nature depends on you!

PRINTED ON
RECYCLED PAPER

ED_005024_00000723-00020

Peninsula Plating
Page Two

Sincerely,

A handwritten signature in cursive script that reads "Robert A. Pritchett".

Robert A. Pritchett, Manager
EPCRA Reporting Program

Attachment

cc: Bob Barrish
Lynn Bullock
Anthony Di Giuseppe
John Mohrman
Alan Simpson
Chris Vennard



STATE OF DELAWARE
DEPARTMENT OF LABOR
DIVISION OF INDUSTRIAL AFFAIRS
6TH FLOOR, STATE OFFICE BUILDING
820 NORTH FRENCH STREET
WILMINGTON, DELAWARE 19801

April 4, 1995

Dear Sir or Madam:

Enclosed is information describing the free services provided by the OSHA consultation service of the Delaware Department of Labor. This program is designed to assist small businesses in identifying hazards and meeting federal OSHA standards in the workplace.

Upon request from the employer, OSHA-trained safety and health consultants will perform a complete inspection of your facility and provide you with a confidential report of the findings. They will also assist you with building proper safety programs and, if necessary, conduct environmental monitoring. All consultation activity is directly related to the federal standards and recommendations for hazard identification and abatement are clear and concise. There are no fines or penalties associated with this service.

Should you, the business owner or manager, have further questions or wish to make an appointment, please return the enclosed request form or call us at 302-577-3908.

Sincerely,

A handwritten signature in cursive script that reads "Randall J. Hair".

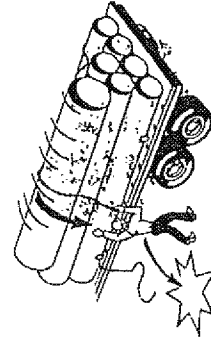
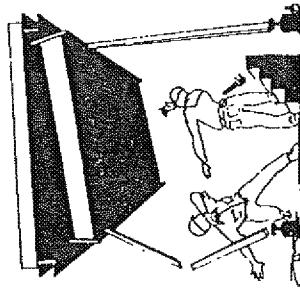
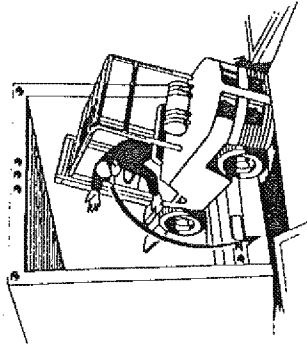
Randall J. Hair, Administrator
OSHA Consultation Service

Enclosures

STATE of DELAWARE

OCCUPATIONAL SAFETY AND HEALTH CONSULTATION SERVICE

AVOID THIS!

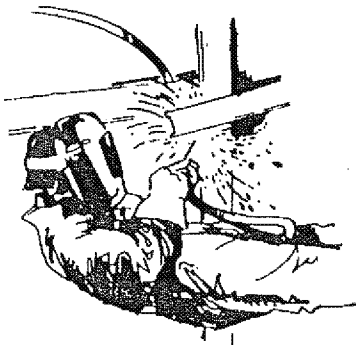


DELAWARE DEPARTMENT OF LABOR
DIVISION OF INDUSTRIAL AFFAIRS
OSHA CONSULTATION SERVICE
820 N. French Street, 6th Floor
Wilmington, Delaware 19801
(302) 577 - 3908

DOCUMENT NO. 60-07/91/03 - L 8

PLACE
STAMP
HERE

To: DELAWARE DEPARTMENT OF LABOR
DIVISION OF INDUSTRIAL AFFAIRS
OSHA CONSULTATION SERVICE
820 N. French Street, 6th Floor
Wilmington, Delaware 19801



FREE SAFETY CHECK

- Consultation Service is separate from federal enforcement and will not trigger an inspection.
- Consultants are advisers, not enforcers.
- Consultants visit only those facilities to which they are invited.
- Consultants are experienced professionals and are extremely knowledgeable about safety and health standards.
- There are no citations or fines.

Job Safety and Health Is Everyone's Business!

Our goal is to prevent the occurrence of injuries and illness which may result from exposure to hazardous workplace conditions and from hazardous work practices.

If you have problems or just questions about meeting the legal requirements of OSHA, (Occupational Safety and Health Act) we can help!

Services We Can Provide

1. Evaluation of the company's safety and health program for providing a safe and healthful place of employment.
2. Identification of specific hazards in the workplace and provision of appropriate advice and assistance toward correcting hazards.
3. Limited on-site education and training for the employer and employees.
4. Environmental monitoring for a variety of contaminants.
5. Assistance with occupational health problems.
6. Assistance through correspondence and via the telephone.

YES, I'D LIKE MORE INFORMATION ON A
FREE CONSULTATION SURVEY

I can be contacted at:

Company Name: _____
Address: _____
City: _____
Company Contact: _____
Phone: _____

Type of Consultation Requested: _____

Safety: _____ Health: _____ Both: _____

Mail in Post Card or Call (302) 577

**Job Safety and Health
Is Everyone's Business!**



STATE OF DELAWARE
DEPARTMENT OF LABOR
DIVISION OF INDUSTRIAL AFFAIRS
6TH FLOOR, STATE OFFICE BUILDING
820 NORTH FRENCH STREET
WILMINGTON, DELAWARE 19801
THE OSHA CONSULTATION SERVICE

Using a free consultation service largely funded by the U. S. Occupational Safety and Health Administration (OSHA), employers can find out about potential hazards at their worksites, improve their safety management systems, and even qualify for one-year exemption from routine OSHA inspections.

This service is delivered by the Delaware Department of Labor using well-trained professional staff. Most consultations take place on-site, though limited services away from the worksite are available. Primarily targeted for smaller businesses, this safety and health consultation program is completely separate from the OSHA inspection effort. In addition, no citations are issued or penalties proposed.

It is also confidential. Your name, your firm's name, and any information you provide about your workplace, plus any unsafe or unhealthful working conditions that the consultant uncovers, will not be routinely reported to the OSHA enforcement staff.

Your only obligation will be to commit yourself to correcting serious job safety and health hazards -- a commitment which you are expected to make prior to the actual visit and carry out in a timely manner.

GETTING STARTED: Since consultation is a voluntary activity, you must request it. Your telephone call or letter sets the consulting machinery in motion. The consultant will discuss your specific needs, and conduct research prior to the visit in preparing to assist you. This ensures that a thorough review of your firm's safety and health situation occurs.

OPENING CONFERENCE: When the consultant arrives at your worksite for the scheduled visit, they will first meet with you in an opening conference to briefly review the consultant's role and the obligation you incur as an employer.

WALK-THROUGH: Together, you and the consultant will examine conditions in your workplace. OSHA strongly encourages maximum employee participation in the walk-through. Better informed and more alert employees can more easily work with you to identify and correct potential injury and illness hazards in your workplace. Talking with employees during the walk-through helps the consultant identify and judge the nature and extent of specific hazards.

The consultant will study your entire facility and discuss the applicable OSHA standards. Consultants also will point out other safety or health risks which nevertheless may pose safety or health risks to your employees. They may suggest other measures such as self-inspection and safety and health training to prevent future hazardous situations.

A comprehensive consultation also includes: (1) appraisal of all mechanical and environmental hazards and physical practices; (2) appraisal of the present job safety and health program or establishment of one; (3) a conference with management on findings; (4) a written report of recommendations and agreements; and (5) training and assistance with implementing recommendations.

CLOSING CONFERENCE: The consultant will then review detailed findings with you in a closing conference. You will learn not only what you need to improve, but what you are doing right, as well. At that time you can discuss problems, possible solutions and abatement periods to eliminate or control any serious hazards identified during the walk-through.

In rare instances, the consultant may find an "imminent danger" situation during the walk-through. If so you must take immediate action to protect all employees. In certain other situations -- those which would be judged a "serious violation" under OSHA criteria -- you and the consultant are required to develop and agree to a reasonable plan and schedule to eliminate or control that hazard. The consultants will offer general approaches and options to you. They may also suggest other sources for technical help.

ABATEMENT AND FOLLOW THROUGH: Following the closing conference, the consultant will send you a written report explaining the findings and confirming any abatement periods agreed upon. Consultants may also contact you from time to time to check your progress. You, of course, may always contact them for assistance.

Ultimately, OSHA does require hazard abatement so that each consultation visit achieves its objective -- effective employee protection. If you fail to eliminate or control identified serious hazards (or an imminent danger) according to the plan and within the limits agreed upon, the situation must be referred from consultation to an OSHA enforcement office for appropriate action. This has occurred only rarely in the past.

BENEFITS: Knowledge of your workplace hazards and ways to eliminate them can only improve your own operations -- and the management of your firm. You will get professional advice and assistance without hiring additional staff. The consultant can help you establish or strengthen an employee safety and health program, making safety and health activities routine considerations rather than crisis-oriented responses. Fixed worksites which undergo a comprehensive consultation, correct all identified hazards, and establish an effective safety and health program may receive a certificate exempting them from programmed inspections for one year. The exemption may be limited to smaller employers and to employees covered by federal OSHA.

THE OSHA CONSULTANTS WILL: ** Help you recognize hazards in your workplace. ** Suggest general approaches or options for solving a safety or health problem. ** Identify kinds of help available if you need further assistance. ** Provide you a written report summarizing findings. ** Assist you to develop or maintain an effective safety and health program. ** Provide training and education for you and your employees. ** Recommend you for a one-year exclusion from OSHA programmed inspections, once program criteria are met.

THE OSHA CONSULTANTS WILL NOT: ** Issue citations or propose penalties for violations of OSHA standards. ** Report possible violations to OSHA enforcement staff. ** Guarantee that your workplace will "pass" an OSHA inspection.

Delaware Department of Labor
OSHA Consultation Service
820 N. French St. 6th/flr
Wilmington, DE 19801
302.577.3908



received
5/31/95

STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES
& ENVIRONMENTAL CONTROL
DIVISION OF AIR & WASTE MANAGEMENT

WASTE MANAGEMENT
SECTION

89 KINGS HIGHWAY
P.O. Box 1401
DOVER, DELAWARE 19903

HAZARDOUS WASTE: (302) 739 - 3689
SOLID WASTE: (302) 739 - 3820
FAX.: (302) 739 - 5060

May 26, 1995

Mr. Anthony DiGiuseppe
Planning Technician
Sussex County Engineering Department
Courthouse Annex
P.O. Box 589
Georgetown, Delaware 19947

Reference: Peninsula Plating, File Code: 09

Dear Mr. DiGiuseppe:

Per our May 24, 1995 conversation, by this letter I am requesting that Sussex County Engineering Department delay its revocation of industrial waste water contribution permit #BL94001 which the Department issued to Peninsula Plating in Blades, Delaware.

I make this request because I believe permit revocation will decrease Peninsula Plating's incentive to remove hazardous waste that is presently at its location.

A copy of the signed Notice of Violation will be forwarded to your attention on May 30, 1995. I request a delay of permit revocation until after the 30 day period given in the Notice for the company to remove the hazardous waste.

Sincerely,

Alan H. Simpson

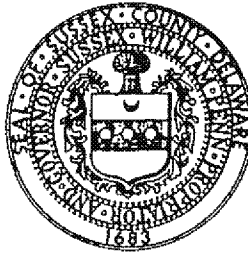
Alan H. Simpson
Environmental Engineer
Hazardous Waste Management Branch

AHS95030
AHS:trh

Delaware's good nature depends on you!

Sussex County
Engineering Department

Robert W. Wood, P.E.
Sussex County Engineer



COURTHOUSE ANNEX
P.O. BOX 589
GEORGETOWN, DELAWARE 19947

PHONES

Engineering Dept.	302-855-7718
Planning & Permits Div.	302-855-7719
Public Works Div.	302-855-7703
Utility Construction Div.	302-855-7717
Operations & Maintenance Div.	302-855-7730

Fax: 302-855-7799

CERTIFIED MAIL
RETURN RECEIPT
REQUESTED

May 30, 1995

Mr. John Donoway
Peninsula Plating, Inc.
RT 5 Box 1C
Blades, DE 19973

REF: BLADES SANITARY SEWER DISTRICT
OPERATIONS AND MAINTENANCE
DISCHARGE PERMIT NO. BL-94001
2

Dear Mr. Donoway:

Peninsula Plating Inc. has not complied with certain portions of the above referenced industrial discharge permit. Under the discharge permit, your company must comply with all conditions of the permit. Any permit non-compliance constitutes a violation of the Clean Water Act and Title 7, Section 6033, Delaware Code Annotated and is grounds for permit termination.

You were sent a certified letter dated April 10, 1995 from Mr. Dennis L. Schrader, Assistant County Attorney, regarding your failure to comply with certain requirements of your discharge permit. He also advised you that termination of your permit would be sought if you had not complied with these requirements to the satisfaction of the County within fifteen (15) days of your receipt of this letter. Our records show that you did not respond to his letter by complying with the permit.

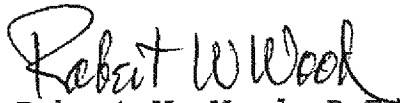
Based upon your non-compliance, we are therefore revoking your firm's discharge permit (NO.BL-94001), effective immediately. In addition, the County has decided to permanently plug your industrial discharge line at the test pit outside of your building.

Mr. John Donoway
May 22, 1995
Page 2

Any further industrial discharge after this point will result in fines and criminal penalties as permitted by law.

Sincerely,

SUSSEX COUNTY ENGINEERING DEPARTMENT

A handwritten signature in cursive script that reads "Robert W. Wood".

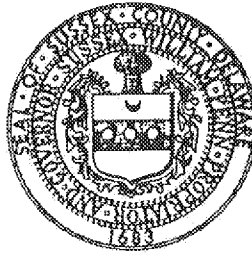
Robert W. Wood, P.E.
Sussex County Engineer

RWW/bl

xc: The Honorable Dale R. Dukes
Mr. Robert L. Stickels
Dennis L. Schrader, Esquire
Mr. Russell W. Archut
Mr. Anthony DiGiuseppe
Mr. Paul Janiga
Mr. Alan H. Simpson
Mr. Delores Slatcher

Sussex County
Engineering Department

Robert W. Wood, P.E.
Sussex County Engineer



COURTHOUSE ANNEX
P.O. BOX 589
GEORGETOWN, DELAWARE 19947

PHONES
Engineering Dept. 302-855-7718
Planning & Permits Div. 302-855-7719
Public Works Div. 302-855-7703
Utility Construction Div. 302-855-7717
Operations & Maintenance Div. 302-855-7730

Fax: 302-855-7799

~~HAND DELIVERED~~

June 12, 1995

Mr. John Donoway
Peninsula Plating, Inc.
RT 5 Box 1C
Blades, DE 19973

REF: BLADES SANITARY SEWER DISTRICT
OPERATIONS AND MAINTENANCE
DISCHARGE PERMIT NO. BL-94001

Dear Mr. Donoway:

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6/21/95

WE WERE UNABLE TO HAND-DELIVER THIS LETTER

BECAUSE SEVERAL ATTEMPTS HAVE BEEN MADE TO SITE
TO DELIVER THIS LETTER. IT IS MY UNDERSTANDING THAT
PENINSULA PLATING HAS CLOSED DOWN.

Send regular mail 6/22/95

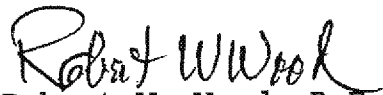
Tony D. B.

Mr. John Donoway
June 12, 1995
Page 2

Any further industrial discharge after this point will result in fines and criminal penalties as permitted by law.

Sincerely,

SUSSEX COUNTY ENGINEERING DEPARTMENT



Robert W. Wood, P.E.
Sussex County Engineer

RWW/bl

xc: The Honorable Dale R. Dukes
Mr. Robert L. Stickels
Dennis L. Schrader, Esquire
Mr. Russell W. Archut
Mr. Anthony DiGiuseppe
Mr. Paul Janiga
Mr. Alan H. Simpson
Mr. Delores Slatcher